

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DAVID E. WILLIAMS
(APWU/USPS-T1-18-20)
(January 17, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-18 Please explain how the proposed changes in service standards are designed to “enhance the value of postal services to both senders and receivers” as required by 39 U.S.C. § 3691(b)(1)(A).

APWU/USPS-T1-19 Does the Postal Service intend to implement the Service Standard changes which are the subject of the Federal Register Notice published December 15, 2011 at 76 *Federal Register* 77942, apart from Network Rationalization and the mail processing changes proposed in this docket?

APWU/USPS-T1-20 Will the Postal Service implement the Network Rationalize Plan on May 15, 2012, before receiving the benefit of the Commission’s advisory opinion in this docket?